

As a resident of a mountainous rural region, I can see no reason why Kenwood's petition should be denied. The technology in question is in the spirit of amateur radio, and can be used to provide valuable, potentially life-saving communications support in emergencies.

Specifically, in the vicinity of my residence, the only reliable means of communication is via 40 and 75/80 meter Near Vertical Incidence Skywave. It is utterly unreasonable to expect that an emergency services worker will be able to hand carry and deploy an NVIS station in any reasonable amount of time. I am aware of this fact as I have engineered a backpackable NVIS station, which, while functional, is heavy and inefficient.

The SkyCommand system in question would allow remote access to a home NVIS station from nearby emergency services deployment sites, such as the local Sheriff's office, providing for immediate communication support statewide.

Frankly, I have trouble understanding the interpretation of the rule which restricts the attended retransmission of HF amateur signals on the 2 meter band. I fully understand that command and control of a remote station would have to occur on appropriate frequencies on the 125 cm and higher bands, but that is what the SkyCommand system implements. According to my understanding of 97.213c and 97.201b, the controlling radio is the auxiliary station. If it only transmits on allowed segments of the 70cm band, there does not appear to be a rules violation.

Any concern that the 2 meter band does not have sufficient bandwidth to support this application should be balanced with the realization that in many parts of the country, the 2 meter band is utterly vacant. In these regions, geography demands that NVIS HF be used for basic communication, and any action by the FCC to facilitate use of that propagation mode can be seen as life-saving.

As amateurs, it is already our job to operate in a way that does not interfere with ongoing communications. As a result, this rule is superfluous. At the least, the most flexible interpretation of the current rules should be allowed.

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